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35           IN THE UNITED STATES DISTRICT COURT  
36           FOR THE NORTHERN DISTRICT OF CALIFORNIA  
37           OAKLAND DIVISION

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39           PHYLLIS NICHOLS, ROBIN COOK, and  
40           LAWRENCE NOVIDA, on behalf of themselves  
41           and all others similarly situated,

42           Plaintiffs,

43           v.

44           META PLATFORMS, INC.,

45           Defendant.

46           Case No. 4:24-CV-02914-JSW

47           **JOINT STIPULATION AND  
48           [PROPOSED] ORDER ON CASE  
49           MANAGEMENT SCHEDULE**

50           Date Action Filed: April 9, 2024

51           Judge: Honorable Jeffrey S. White

1        WHEREAS, on October 8, 2024, this Court ordered the parties “to meet and confer and propose  
 2 a joint case management schedule by October 25, 2024” that “need not include anticipated trial dates  
 3 or pretrial deadlines” (Dkt. 34);

4        WHEREAS, Meta Platforms Inc. (“Meta”) and plaintiffs met and conferred and agreed upon a  
 5 proposed joint case management schedule;

6        WHEREAS, in the Rule 26(f) Report and Initial Case Management Statement (Dkt. 32), Meta  
 7 “request[ed] that discovery in this case be referred to Magistrate Judge DeMarchi so that it can be  
 8 coordinated with discovery in the other actions pending in the Northern District of California against  
 9 Meta related to the use of the Meta Pixel in which discovery similarly has been referred to Judge  
 10 DeMarchi”;

11      WHEREAS, plaintiffs do not oppose referral and coordination of discovery with Judge  
 12 DeMarchi.

13      NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
 14 plaintiffs and Meta, subject to the approval of this Court, that:

- 15      1. All discovery matters are referred to Magistrate Judge Virginia K. DeMarchi; and  
 16      2. The joint proposed case management schedule is as follows:

<b>Case Event</b>	<b>Deadline</b>
Amendments to Pleadings deadline	January 3, 2025
Completion of all fact discovery	May 4, 2026
Plaintiffs’ motion for class certification and any expert reports in support of class certification due	June 3, 2026
Defendant’s opposition to Plaintiff’s motion for class certification and any class certification expert reports due	August 12, 2026
Plaintiffs’ reply brief on class certification due	September 25, 2026
Deadline for Opening Expert Disclosures (merits and non-class)	45 days following decision on class certification

1	Case Event	Deadline
2	Deadline for Rebuttal Expert Disclosures (merits and non-class)	45 days following filing of opening expert disclosures
3	Deadline for Reply Expert Disclosures (merits and non-class)	30 days following filing of rebuttal expert disclosures
4	Close of Expert Discovery	30 days following filing of reply expert disclosures
5	All opening dispositive motions filed	45 days following the close of expert discovery

10 IT IS SO STIPULATED.

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1 DATED: October 25, 2024

**GIBSON, DUNN & CRUTCHER LLP**

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19 *Attorneys for Defendant Meta Platforms, Inc.*

1 DATED: October 25, 2024

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27  
28 *Attorneys for Plaintiffs*

**[PROPOSED] ORDER****PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

1. All discovery matters are referred to Magistrate Judge Virginia K. DeMarchi.
2. The case management schedule is as follows:

Case Event	Deadline
Amendments to Pleadings deadline	January 3, 2025
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Close of Expert Discovery	30 days following filing of reply expert disclosures
All opening dispositive motions filed	45 days following the close of expert discovery

Dated: \_\_\_\_\_

Jeffrey S. White  
United States District Judge

**CIVIL L.R. 5-1(i)(3) ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Elizabeth K. McCloskey, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: October 25, 2024

By:/s/ Elizabeth K. McCloskey